

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

RACHEL RAMSBOTTOM,
ALEXIS BOWLING,
JENNA HOUSTON, JANE DOE #1

Plaintiffs,

v.

LORIN ASHTON, AMORPHOUS
MUSIC, INC., BASSNECTAR
TOURING, INC., REDLIGHT
MANAGEMENT, INC., C3 PRESENTS,
L.L.C, INTERACTIVE GIVING FUND,
GNARLOS INDUSTRIES, LLC,
CARLOS DONOHUE, ABC
CORPORATIONS, ONE THROUGH
TEN (said Names Being Fictitious),
JOHN DOES, ONE THROUGH TEN
(said Names Being Fictitious),

Defendants.

CIVIL ACTION NO. 3:21-cv-00272

JURY TRIAL DEMANDED

JUDGE ALETA A. TRAUGER

DECLARATION OF MITCHELL SCHUSTER IN SUPPORT OF AMORPHOUS MUSIC
INC.'S AND BASSNECTAR TOURING, INC.'S RULE 12(b)(2), 12(b)(3) AND 12(b)(6)
MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT

I, Mitchell Schuster, state as follows:

1. Defendant Amorphous Music, Inc. ("AMI") is a corporation that was formed under the laws of the State of California on July 20, 2007. A true copy of the Articles of Incorporation of AMI is attached as **Exhibit A**.

2. According to a Business Information Search on the Tennessee Secretary of State website (<https://tnbear.tn.gov/Ecommerce/FilingSearch.aspx>) ("TN Sec of State Website"), AMI is not currently, nor was it ever, registered to do business in the State of Tennessee. A true copy of the search results for AMI on the TN Sec of State Website, completed on July 15, 2021, indicating no records is attached as **Exhibit B**.

3. Defendant Bassnectar Touring, Inc. (“BTI”) is a corporation that was formed under the laws of the State of Delaware on September 10, 2010. A true copy of the Articles of Incorporation of BTI is attached as **Exhibit C**.

4. According to the TN Sec of State Website, BTI is not currently, nor was it ever, registered to do business in the State of Tennessee. A true copy of the search results for BTI on the TN Sec of State Website, completed on July 15, 2021, indicating no records are attached as **Exhibit D**.

5. I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct



MITCHELL SCHUSTER

Dated: July 16, 2021

Respectfully Submitted,

s/ Robert A. Peal

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and exact copy of the foregoing was served on the following counsel via the Court's CM/ECF system on this 16th day of July, 2021:

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s/ Robert A. Peal